

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ZSA ZSA JEWELS, INC.,

Plaintiff,

-against-

BMW OF NORTH AMERICA, LLC; BRIDGESTONE
AMERICAS TIRE OPERATIONS, LLC; MORRIS
COUNTY AUTO SALES, INC. A/K/A BMW OF
MORRISTOWN; and OPEN ROAD OF EDISON, INC.
A/K/A OPEN ROAD BMW,

Defendants.

Civil Case No.:
1:15-cv-06519 (ILG) (RLM)

**DEFENDANT BMW NA'S
NOTICE OF MOTION *IN LIMINE***

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendant's Motion *In Limine* for Spoliation Sanctions; the Declaration of Joseph Kim, Esq., and the exhibits attached thereto; defendant BMW OF NORTH AMERICA, LLC ("BMW NA" of "Defendant"), by its attorneys Biedermann Hoenig Semprevivo, A Professional Corporation, will move this Court before the Hon. U.S. District Judge I. Leo Glasser, on a return date to be set by the Court, for an Order granting spoliation sanctions as against Plaintiff, along with such other, further, or different relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1, Plaintiff's opposing papers to the Motion, if any, shall be served on or before May 20, 2021; and BMW NA's reply papers, if any, shall be served within 2 days of the service of Plaintiff's opposing papers.

Dated: New York, New York
May 13, 2021

BIEDERMANN HOENIG SEMPREVIVO,
A Professional Corporation

By: /s/ Joseph Kim
Joseph Kim, Esq.

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